

## **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF ALABAMA**  
**SOUTHERN DIVISION**

LINDA BROOKS )  
 )  
 PLAINTIFF, )  
 )  
 v. ) CASE # 1:06-CV-62  
 )  
 LAW OFFICE OF SAM STREETER, P.L.L.C. )  
 STACY VOGLE INDIVIDUALLY, & )  
 MR. CORRALES, INDIVIDUALLY, )  
 )  
 DEFENDANTS. )

**PLAINTIFF'S AFFIDAVIT IN SUPPORT OF  
MOTION FOR SUMMARY JUDGMENT**

STATE OF TEXAS )  
COUNTY OF HARRIS )

COMES NOW, Sam Streeter, who after being duly sworn deposes and says under oath as follows:

I, Sam Streeter am employed at The Law Offices of Sam Streeter, the Defendant in this case, as Attorney. I have under my supervision, custody and control the Law Office of Sam Streeter's books and records and I am familiar with the Law Office of Sam Streeter's business practices and procedures. I am familiar with Defendant's books and records regarding the account of Linda Brooks, Plaintiff in this case and I am authorized and competent to testify to the matters herein. The following statements are of my personal knowledge and I am competent to testify to the matters here set forth:

I am a custodian of the business records of Law Office of Sam Streeter in my above referenced capacity as Attorney. I certify that the documents labeled "Exhibit C", attached to Defendant's Motion for Summary Judgment are kept in the regular and ordinary course of business of Law Offices of Sam Streeter. Said documents are made in good faith contemporaneous to each transaction by employees of Law Offices of Sam Streeter, who have personal knowledge thereof, and are kept by the company in the ordinary and regular course of the Law Offices of Sam Streeter's business. I certify that the business records (Exhibit C) attached to Defendant's Motion for Summary Judgment are exact duplicates of the originals and were made under my personal supervision.



Sam Streeter, Law Offices of Sam Streeter

STATE OF TEXAS )

COUNTY OF HARRIS )

Before me, the undersigned authority in and for said County and State, personally appeared Sam Streeter, who being first duly sworn, states that he is  
A. Horney of Law Offices of Sam Streeter, and that all the matters contained herein are true and correct.

Sworn to and subscribed before me on this the 23 day of October 2006.

Fran A. Chambers

Notary Public

My Commission Expires: 8/2/10



## **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

LINDA BROOKS )  
 )  
 PLAINTIFF, )  
 )  
 v. ) CASE # 1:06-CV-62  
 )  
 LAW OFFICE OF SAM STREETER, P.L.L.C. )  
 STACY VOGLE INDIVIDUALLY, & )  
 MR. CORRALES, INDIVIDUALLY, )  
 )  
 DEFENDANTS. )

**Law Office of Sam Streeter's Requests for Admissions**

The Law Office of Sam Streeter hereinafter referred to as "Streeter", requests Plaintiff to admit to the truth of the following facts:

1. Plaintiff has suffered no actual injuries as a result of any actions by the Defendants.
2. Plaintiff was never hospitalized as a direct result of any actions of the Defendants.
3. Plaintiff has never consulted a physician with regard to any injuries she claims are a result of any actions of Defendants.
4. Plaintiff has never consulted with a mental health professional with regard to any injuries she claims are a result of any actions of Defendants.
5. Plaintiff has not been prescribed any medication as a direct result of any action of Defendants.
6. Plaintiff was told when speaking directly with the Defendants that the call was in regard to a debt owed on her Visa account.
7. Defendants did not call Plaintiff before 8:00 AM or after 9:00 PM.
8. When speaking with the Plaintiff or any of the third parties referred to in this matter, by the Plaintiff, the Defendants did not use profanity or threats of physical harm.

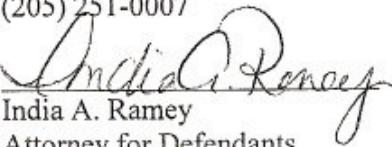
9. Plaintiff never communicated in writing to Defendants that she wanted them to seize and desist attempting to contact her.

10. When talking to the third parties to whom Plaintiff has referred in this action, Defendants did not say that they were debt collectors or that Plaintiff owed a debt.

11. Defendants did not repeatedly call Plaintiff.

12. Defendant did not state to the Plaintiff or any of the third parties to whom Plaintiff refers in this matter, that legal action had been initiated.

  
W. McCollum Halcomb  
Attorney for Defendants  
HALCOMB & WERTHEIM, PC  
P.O.Box 12005  
Birmingham, AL 35202-2005  
(205) 251-0007

  
India A. Ramey  
Attorney for Defendants  
HALCOMB & WERTHEIM, PC  
P.O.Box 12005  
Birmingham, AL 35202-2005  
(205) 251-0007

#### **Certificate of Service**

I hereby certify that I have served a copy of the forgoing upon counsel for the Plaintiffs via US Mail, postage prepaid, this the 16 day of August, 2006, to the following address:

Gerald A. Templeton  
The Templeton Group, P.C.  
1000 Providence Park  
Suite, 200  
Birmingham, AL 35242

  
Of Counsel